

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

THE GENERAL HOSPITAL	)	
CORPORATION and	)	
DANA-FARBER CANCER	)	
INSTITUTE, INC.,	)	
	)	
Plaintiffs,	)	C.A. No. 1:18-cv-11360-IT
	)	
v.	)	
	)	
ESOTERIX GENETIC	)	
LABORATORIES, LLC and	)	
LABORATORY CORPORATION	)	
OF AMERICA HOLDINGS,	)	
	)	
Defendants.	)	
	)	

**JOINT MOTION TO AMEND CASE SCHEDULE**

The parties, the plaintiffs The General Hospital Corporation and Dana-Farber Cancer Institute, Inc. and the defendants Esoterix Genetic Laboratories, LLC and Laboratory Corporation of America Holdings (a/k/a Laboratory Corporation of America), hereby jointly move to amend the remaining items on the Court's current case schedule [*see* Dkt. No. 139] as set forth below.

Task	Current Deadline	Amended Deadline
Completion of fact depositions	June 30, 2020	September 30, 2020
Completion of fact discovery	June 30, 2020	September 30, 2020
Status Conference	June 30, 2020 @ 2:00 p.m.	September 30, 2020 @ 2:00 p.m. or some other date and time convenient to the Court
Filing of dispositive motions	July 31, 2020	October 30, 2020

In support of their joint motion, and by way of a further status update since the parties joint motion to extend filed on March 19, 2020, the parties state that they have substantially completed email discovery and the discovery of other electronically stored information, and the parties continue to work cooperatively to complete discovery, including the exchange of privilege logs and the taking of depositions. The parties require the requested additional time to allow them sufficient time to take depositions after it is expected that the current COVID-19 crisis and its restrictions on travel and in-person gatherings let up. The parties have exchanged lists of the witnesses they would like to depose, reserving all rights to identify additional individuals, and are working cooperatively on scheduling. The parties anticipate taking many of the depositions in person and respectfully request this further amendment to allow sufficient time for the parties to do so.

**WHEREFORE**, the parties respectfully request that this Court grant their Joint Motion to Amend Case Schedule.

\* \* \*

Respectfully submitted,

Plaintiffs,  
THE GENERAL HOSPITAL  
CORPORATION and  
DANA-FARBER CANCER  
INSTITUTE, INC.

By their attorneys,

/s/ Carolyn M. Crowley  
Douglas J. Nash (BBO# 633050)  
Carolyn M. Crowley (BBO# 663616)  
Barclay Damon LLP  
One Financial Center, Suite 1701  
Boston, MA 02111  
(617) 274-2900  
dnash@barclaydamon.com  
ccrowley@barclaydamon.com

Defendants,  
ESOTERIX GENETIC LABORATORIES,  
LLC and LABORATORY CORPORATION  
OF AMERICA HOLDINGS,

By their attorneys,

/s/ Jaclyn M. Metzinger  
James M. Campbell (BBO# 541882)  
Christopher R. Howe (BBO# 652445)  
Campbell Campbell Edwards & Conroy, P.C.  
One Constitution Center, 3<sup>rd</sup> Floor  
Boston, MA 02129  
(617) 241-3041  
jmcampbell@campell-trial-lawyers.com  
chowe@campbell-trial-lawyers.com

Robert I. Steiner (admitted *pro hac vice*)  
Jaclyn M. Metzinger (admitted *pro hac vice*)  
Kelley Drye & Warren LLP  
101 Park Avenue  
New York, NY 10178  
(212) 808-7800  
rsteiner@kelleydrye.com  
jmetzinger@kelleydrye.com

Dated: June 25, 2020

**CERTIFICATE OF SERVICE**

I, Carolyn M. Crowley, certify that on June 25, 2020, I filed this Joint Motion to Amend Case Schedule on the Court's CM/ECF system, which will electronically serve all counsel of record in this case.

*/s/ Carolyn M. Crowley*  
Carolyn M. Crowley